

1 AARON D. FORD
Attorney General
2 JEFFREY M. CONNER (Bar. No. 11543)
Deputy Solicitor General
3 State of Nevada
Office of the Attorney General
4 100 North Carson Street
Carson City, NV 89701-4717
5 (775) 684-1100 (phone)
(775) 684-1108 (fax)
6 jconner@ag.nv.gov
Attorneys for Respondents
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JOHN MICHAEL FARNUM,

11 Petitioner,

12 vs.

13 ROBERT LeGRAND, *et al.*,

14 Respondents.

Case No. 2:13-cv-01304-APG-BNW

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME (SECOND
REQUEST)**

ORDER

15 Respondents, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada,
16 hereby respectfully move this Court for an order granting a twenty-one (21) day enlargement of time, to
17 and including June 28, 2019, in which to file and serve their answer.

18 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
19 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and
20 other materials on file herein.

21 There has been one prior enlargement of Respondents' time to file said answer, and this motion
22 is made in good faith and not for the purposes of delay.

23 RESPECTFULLY SUBMITTED this 7th day of June, 2019.

24 AARON D. FORD
Attorney General

25
26 By: /s/ Jeffrey M. Conner
JEFFREY M. CONNER (Bar. No. 11543)
Deputy Solicitor General
27
28

1 AARON D. FORD
Attorney General
2 JEFFREY M. CONNER (Bar. No. 11543)
Deputy Solicitor General
3 State of Nevada
Office of the Attorney General
4 100 North Carson Street
Carson City, NV 89701-4717
5 (775) 684-1100 (phone)
(775) 684-1108 (fax)
6 jconner@ag.nv.gov
Attorneys for Respondents
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JOHN MICHAEL FARNUM,

11 Petitioner,

12 vs.

13 ROBERT LeGRAND, *et al.*,

14 Respondents.

Case No. 2:13-cv-01304-APG-BNW

DECLARATION OF COUNSEL

15 I, JEFFREY M. CONNER, declare under penalty of perjury:

16 1. I am a Deputy Solicitor General employed by the Nevada Attorney General's Office, and I
17 make this declaration on behalf of Respondents' motion for enlargement of time in the above-captioned
18 matter.

19 2. Respondents' answer to the remaining claims of the Mr. Farnum's petition is currently due
20 June 7, 2019. By this motion, I am requesting an enlargement of twenty-one (21) days, to and including
21 June 28, 2019, to file Respondents' answer. This is my second request for an enlargement of time regarding
22 the answer.

23 3. Since Respondents initial request for an extension, I have remained exceedingly busy
24 working on numerous state and federal matters. At current, in addition to working on this case and my other
25 regular assignments within the Attorney General's Office, I am in the process of preparing for an *en banc*
26 argument in *Ross v. Williams*, No. 16-16533 (9th Cir.), which is scheduled for June 19, 2019. As a result
27 of the foregoing, I need additional time to complete the answer to the petition while balancing that
28 obligation with the need to adequately prepare for the argument in *Ross*. Accordingly, Respondents

1 respectfully request that this Court issue an order granting them an enlargement of twenty-one (21) days,
2 to and including June 28, 2019, to file the answer to the second-amended petition.

3 4. I informed opposing counsel, Lisa Rasmussen and Michael Schwarz, of my intention to
4 seek an enlargement of time by e-mail. Both Mr. Schwarz and Ms. Rasmussen responded and indicated
5 they have no objection to Respondents' request for additional time.


6 5. This motion for enlargement of time is made in good faith and not for the purpose of
7 unduly delaying the ultimate disposition of this case.

8 I declare under penalty of perjury that the foregoing is true and correct.

9 By: /s/ Jeffrey M. Conner
10 JEFFREY M. CONNER (Bar. No. 11543)
11 Deputy Solicitor General

12 **ORDER**

13 IT IS SO ORDERED.

14
15 
16 UNITED STATES DISTRICT JUDGE
17 Dated: June 7, 2019.
18
19
20
21
22
23
24
25
26
27
28